

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

NATHAN LING,

PLAINTIFF,

VS

CIVIL ACTION NO: 3:20-CV-233

CAMPBELL COUNTY, TENNESSEE;
JUSTIN CRABTREE; DAKOTA WILLIAMS;
SEAN BROWN; JOSHUA MILLER, in their
individual and official capacities;
and JOHN DOES, names and identities
not yet known,

DEFENDANTS.

PRETRIAL DISCOVERY DEPOSITION OF:

ALEXANDER STANDRIDGE

TAKEN ON APRIL 25, 2023

* * * THIS STYLE PAGE IS CONTINUED * * *

APPEARANCES:

FOR PLAINTIFF: TONY SEATON, ESQ.
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FOR DEFENDANTS: ARTHUR F. KNIGHT, III, ESQ.
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1 Crabtree immediately grabbed him by his hair and the
2 cuffs, twisted him around towards the brick wall and
3 started mashing his face against the bricks a little
4 bit. Way too excessive. Wasn't just pressing, he
5 was slamming his face into the brick wall. And
6 that's when we had the door opened up to enter the
7 search room towards booking, and we got him into
8 there, hoping the situation was going to calm down,
9 but it didn't.

10 Q. Was Ling resisting?

11 A. From what I seen, he was resisting a bit
12 in the car. When he got out of the car, I'm not sure
13 if he was resisting or not. Crabtree was moving way
14 too quick with him.

15 Q. Okay. So you were in the sally port
16 with Standridge, or you, Standridge, and Brown and
17 Miller.

18 A. Yes, Sir.

19 Q. Justin Crabtree pulls in and all he's
20 got is Ling in the back seat, right?

21 A. Yes, Sir.

22 Q. So he gets Ling out, drags him out, is
23 what you said. He's cuffed behind his back, isn't
24 he?

25 A. Yes, Sir.

1 Q. Uh-huh.

2 A. I believe they were just worried if
3 there was consequences or not.

4 Q. Consequences for what?

5 A. For the actions that they went with
6 during the whole incident.

7 Q. For beating Mr. Ling?

8 A. Yes, Sir.

9 Q. So there's no discussion about getting
10 him medical help?

11 A. No, Sir.

12 Q. Was he clearly in need of medical help?

13 A. Yes, Sir.

14 Q. Were they hoping he was going to lay
15 down in that cell and die?

16 MR. KNIGHT: Object to form.

17 A. I'm unsure on that. Every so often, one
18 of us would peek in and check on him. He never left
19 that final position, after the shower when we laid
20 him into the cell in the fetal position, he never
21 moved.

22 Q. All night?

23 A. All night. There was a few times I
24 opened the cell to make sure he was breathing. I
25 wasn't really sure if I could do anything else.

1 picked up a thing of PTSD from prior to the jail of
2 fire service with Sean Brown and some other things
3 that had happened in my life. So when something
4 tragic happens, my mind fixates on that, and I kinda
5 space out and I just go through motions.

6 Q. Do you think you were just following the
7 culture there?

8 A. Yes, Sir.

9 MR. KNIGHT: Object to the form.

10 Q. Was there a culture of abusing inmates?

11 MR. KNIGHT: Object to the form.

12 A. Not that I know.

13 Q. Was there a culture of ignoring serious
14 medical needs of inmates?

15 MR. KNIGHT: Object to the form.

16 A. Not to my knowledge.

17 Q. Well, there's obviously not a culture of
18 assisting a man in serious medical needs, right?

19 MR. KNIGHT: Object to the form.

20 A. Correct.

21 Q. All right. So let's go back to the
22 shower. You said that you and Joshua Miller, and you
23 think Dakota Williams took him into the shower?

24 A. Dakota Williams had entered the shower
25 prior to Miller stepping back. Ling did start to

1 resist a little bit, unsure why we had taken him
2 down. And Miller left me alone. He would not go
3 hands on again. And that's when Dakota Williams had
4 seen I needed some assistance and came in to help me
5 keep him stable enough to finish the shower and
6 escort him back to the holding cell.

7 Q. And so how many times did Dakota
8 Williams hit Mr. Ling in the shower?

9 A. I'm unsure.

10 Q. Was it more than once?

11 A. I'm unsure on it.

12 Q. Did you ever see Dakota Williams hit Mr.
13 Ling in the shower?

14 A. No, Sir.

15 Q. Joshua Miller tells us Dakota Williams
16 hit Ling three times in the back in the shower. You
17 never saw that?

18 A. No, Sir. The way we were positioned in
19 the floor of the bathroom,...

20 Q. Uh-huh.

21 A. ...I was up towards his upper torso,
22 trying to keep control of his shoulders and keep him
23 close to me so he didn't move as much.

24 Q. Uh-huh.

25 A. Dakota Williams was behind me during it,